

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

(1) DANIEL HANCHETT, as Personal representative of the Estate of Shannon Hanchett, Deceased,

Plaintiff,

VS.

CASE NO.: 24-CV-87-G

(1) SHERIFF OF CLEVELAND COUNTY,
IN HIS OFFICIAL CAPACITY,

(2) TURN KEY HEALTH CLINICS, LLC,

(3) JAWAUN LEWIS

(4) DIANA MYLES-HENDERSON, LPC,

(5) TARA DOTO, LPN,

(6) NATASHA KARIUKI, LPN,

(7) JEWEL JOHNSON, LPN,

Defendants.

**PLAINTIFF'S MOTION TO FILE EXHIBIT TO HIS
RESPONSE IN OPPOSITION TO DEFENDANT SHERIFF
OF CLEVELAND COUNTY'S MOTION TO DISMISS UNDER SEAL**

Defendant Sheriff of Cleveland County filed his Motion to Dismiss Plaintiff's Amended Complaint on September 23, 2024. *See* Dkt. #61. The current deadline for Plaintiff to file his Response in Opposition to Defendant Sheriff's Motion to Dismiss is October 22, 2024. Plaintiff will be filing surveillance video from the Cleveland County Jail ("Jail") as an exhibit to his Response in Opposition to Defendant Sheriff's Motion to Dismiss. This surveillance video has previously been designated as "Confidential Material" under the Agreed Protective Order (Dkt. #51) in this case. Under the Agreed Protective Order, any document or

material designated as “Confidential Material” by any party must be filed under seal. *See* Dkt. #51 at 3-4.

Plaintiff thus seeks permission from this Court to file the Jail surveillance video of Decedent Shannon Hanchett to his Response in Opposition to Defendant Sheriff of Cleveland County’s Motion to Dismiss under seal. A proposed Order is being submitted with this Motion.

WHEREFORE PREMISES CONSIDERED, Plaintiff respectfully requests the Court enter an Order permitting Plaintiff to file Jail surveillance video as an exhibit to his Response in Opposition to Defendant Sheriff of Cleveland County’s Motion to Dismiss under seal.

Respectfully submitted,

SMOLEN & ROYTMAN

/s/ Robert M. Blakemore
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2024, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all ECF registrants who have appeared in this case.

/s/ Robert M. Blakemore